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8 UNITED STATES DISTRICT COURT

9 NORTHERN DISTRICT OF CALIFORNIA

10 SAN FRANCISCO DIVISION

11 GOOGLE LLC,

12 Plaintiff,

13 vs.

14 SONOS, INC.,

15 Defendant.

CASE NO. 3:20-cv-06754-WHA

Related to CASE NO. 3:21-cv-07559-WHA

**DECLARATION OF JOCELYN MA IN
SUPPORT OF SONOS, INC.'S
ADMINISTRATIVE MOTION TO
CONSIDER WHETHER ANOTHER
PARTY'S MATERIAL SHOULD BE
SEALED (DKT. NO. 252)**

I, Jocelyn Ma, declare and state as follows:

1. I am an attorney licensed to practice in the State of California and am admitted to practice before this Court. I am an associate at Quinn Emanuel Urquhart & Sullivan LLP representing Google LLC (“Google”) in this matter. I have personal knowledge of the matters set forth in this Declaration, and if called as a witness I would testify competently to those matters.

2. I make this declaration in support of Sonos, Inc.’s (“Sonos”) Administrative Motion to Consider Whether Another Party’s Material Should Be Sealed (“Administrative Motion”) (Dkt. No. 252) filed in connection with Sonos’s Opposition to Google’s Motion for Summary Judgment Pursuant to the Court’s Patent Showdown Procedure (“Opposition”) (Dkt. No. 251). If called as a witness, I could and would testify competently to the information contained herein.

3. Google seeks an order sealing the materials as listed below:

Document	Portions Sonos Sought to Be Filed Under Seal	Portions Google Seeks to Be Filed Under Seal	Designating Party
Sonos’s Opposition	Portions Highlighted in Green	Portions Highlighted in Green	Google
Exhibit 1 to the Declaration of Michael P. Boyea in Support of Opposition (“Exhibit 1”)	Entire Document	Portions Outlined in Red Boxes	Google
Exhibit 2 to the Declaration of Michael P. Boyea in Support of Opposition (“Exhibit 2”)	Entire Document	Entire Document	Google
Exhibit 3 to the Declaration of Michael P. Boyea in Support of Opposition (“Exhibit 3”)	Entire Document	Entire Document	Google
Exhibit 4 to the Declaration of Michael P. Boyea in Support of Opposition (“Exhibit 4”)	Entire Document	Entire Document	Google
Exhibit 7 to the Declaration of Michael P. Boyea in Support of Opposition (“Exhibit 7”)	Entire Document	Entire Document	Google
Exhibit 9 to the Declaration of Michael P. Boyea in Support of Opposition (“Exhibit 9”)	Entire Document	Entire Document	Google
Exhibit 10 to the Declaration of Michael P. Boyea in Support of Opposition (“Exhibit 10”)	Entire Document	Entire Document	Google

Exhibit 11 to the Declaration of Michael P. Boyea in Support of Opposition (“Exhibit 11”)	Entire Document	Entire Document	Google
Exhibit 12 to the Declaration of Michael P. Boyea in Support of Opposition (“Exhibit 12”)	Entire Document	Entire Document	Google
Exhibit 13 to the Declaration of Michael P. Boyea in Support of Opposition (“Exhibit 13”)	Entire Document	Entire Document	Google
Exhibit 14 to the Declaration of Michael P. Boyea in Support of Opposition (“Exhibit 14”)	Entire Document	Entire Document	Google
Exhibit 15 to the Declaration of Michael P. Boyea in Support of Opposition (“Exhibit 15”)	Entire Document	None	Google
Exhibit 16 to the Declaration of Michael P. Boyea in Support of Opposition (“Exhibit 16”)	Entire Document	Entire Document	Google

4. I understand that the Court analyzes sealing requests in connection with motions for summary judgment pursuant to the “compelling reasons” standard. *See, e.g., Edwards Lifesciences Corp. v. Meril Life Scis. Pvt. Ltd.*, No. 19-CV-06593-HSG, 2021 WL 5233129, at *4 (N.D. Cal. Nov. 10, 2021); *Baird v. BlackRock Institutional Tr. Co., N.A.*, No. 17-CV-01892-HSG, 2021 WL 105619, at *5 (N.D. Cal. Jan. 12, 2021). I also understand that courts have found materials which detail product architecture and could harm a litigant’s competitive standing are appropriately sealed under this standard. *See, e.g., Icon-IP Pty Ltd. v. Specialized Bicycle Components, Inc.*, No. 12-cv-03844-JST, 2015 WL 984121, at *2 (N.D. Cal. Mar. 4, 2015); *Delphix Corp. v. Actifo, Inc.*, No. 13-cv-04613-BLF, 2014 WL 4145520, at *2 (N.D. Cal. Aug. 20, 2014).

5. Sonos’s Opposition and Exhibits 2, 3, 4, 7, 9, 10, 11, 12, 13, 14, and 16 contain references to Google’s confidential business information and trade secrets, including details regarding source code, architecture, and technical operation of Google’s products, as well as internal discussions between Google employees regarding this information. The specifics of how these functionalities operate is confidential information that Google does not share publicly. Thus, I understand that the public disclosure of such information could lead to competitive harm to Google, as competitors could use these details regarding the architecture and functionality of Google’s products to gain a competitive advantage in the marketplace with respect to their competing products. Google has

